

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

Jamal Stephenson and Melanie Baron	)	CASE NO. 1:18-cv-2017
	)	
Plaintiffs,	)	JUDGE PAMELA A. BARKER
	)	
v.	)	
	)	
Family Solutions of Ohio, Inc., et al.	)	<b><u>DECLARATION OF</u></b>
	)	<b><u>SCOTT PERLMUTER</u></b>
	)	
Defendants.	)	

I, Scott Perlmutter, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct to the best of my personal knowledge, information, and belief:

1. I am lead counsel for the Plaintiffs in the above-captioned matter.
2. The Court-approved settlement of this matter called for settlement payments to be made in installments of \$178,333.33 on November 1, 2023 and June 1, 2024, and an installment of \$178,333.34 on January 2, 2025.
3. As Plaintiffs alerted this Court in ECF Nos. 212 and 216, Defendants failed to make even the first settlement payment in full.
4. In terms of assessing the current status of payments, Defendants issued settlement payments directly to class members. Thus, Plaintiffs' counsel is largely dependent on information provided by Defendants.
5. On October 30, 2023, in the correspondence attached hereto as Exhibit 1-A, that they had issued \$148,433.86 worth of settlement checks.
6. No additional settlement payments have been made by Defendants since the attached October 30, 2023 correspondence.

**EXHIBIT 1**

7. From November 2023, when Defendants first breached the settlement agreement, through the present, I have made many dozens of attempts to resolve Defendants' breach without involving the Court.

8. I sent e-mails attempting to craft a resolution to Defendants' breach on November 27, 2023, December 1, 2023, December 5, 2023, December 6, 2023, December 7, 2023, December 10, 2023, December 20, 2023, December 23, 2023, January 4, 2024, January 5, 2024, January 9, 2024, February 11, 2024, March 19, 2024, May 3, 2024, May 14, 2024, May 15, 2024, May 16, 2024, June 5, 2024, June 6, 2024, June 9, 2024, June 11, 2024, June 12, 2024, June 13, 2024, June 27, 2024, July 2, 2024, July 5, 2024, July 8, 2024, July 18, 2024, August 15, 2024, August 19, 2024, August 28, 2024, August 31, 2024, September 1, 2024, September 4, 2024, October 8, 2024, October 9, 2024, October 15, 2024, October 29, 2024, November 18, 2024, December 1, 2024, December 4, 2024, December 17, 2024, and January 2, 2025.

9. Interspersed among those emails have been numerous Zoom and telephone calls with defense counsel also made in attempts to resolve Defendants' breach without involving the Court, including on June 12, 2024, June 26, 2024, July 2, 2024, October 15, 2024, November 8, 2024, December 3, 2024, and January 10, 2025.

10. We have proposed numerous alternatives to bring Defendants current with their settlement obligations. Examples are attached at Exhibit 1-B.

11. We have made every possible good faith effort to rectify Defendants' failure to pay the settlement as promised.

12. In response, we have received empty promises, over and over again. By way of example, on June 12, 2024, defense counsel represented that the second round of checks and

delinquent first round of checks had recently been issued. That turned out to be untrue. That empty promise and later admission of its falsity is attached hereto at Exhibit 1-C.

13. On July 20, 2024, defense counsel promised to produce a new timeline for issuance of checks by the following Monday, July 22, 2024. That date came and went with no timeline, as shown in Exhibit 1-D.

14. Again, at the present time, as shown in Exhibit 1-A, Defendants claim to have issued 175 checks, and acknowledge that 62 have not been cashed.

15. The settlement agreement calls for Defendants to have distributed 545 checks.

16. To date, Defendants have made \$137,322.49 in settlement payments that have been received by class members and/or my firm.

17. An additional \$11,111.37 was allegedly sent to class members in checks that have not been cashed. However, that representation by Defendants is dubious, given that I have spoken with numerous would-be recipients of those checks who have confirmed that Defendants have their correct address and that they have not received the checks in question.

18. As the last installment date has now passed, Defendants owe \$397,677.51 under the parties' settlement agreement.

s/ Scott D. Perlmutter  
SCOTT D. PERLMUTER (0082856)  
Tittle & Perlmutter  
4106 Bridge Ave.  
Cleveland, OH 44113  
Ph.: (216) 285-9991  
Fax: (888) 604-9299  
Email: scott@tittlelawfirm.com

January 23, 2025



**SAMMON LAW LLC**  
LEGAL PROFESSIONALS

216.978.3308  
216.916.4905  
Sammonlaw.com  
4931 Shady Brooke Run  
Medina, Ohio 44256

October 30, 2024

**VIA EMAIL**

Scott Perlmutter  
Tittle & Perlmutter  
4106 Bridge Avenue  
Cleveland, Ohio 44113  
scott@tittlelawfirm.com

**Re: *Jamal Stephenson v. John A. Hopkins, Sr., et al.***  
United States District Court (N.D. Ohio) Cas No. 1:24-cv-01830  
***Jamal Stephenson v. Family Solutions of Ohio, Inc., at al.***  
United States District Court (N.D. Ohio) Case No. 1:18-cv-02017  
SL File No. 5111-P

Dear Scott:

I have received the following breakdown of payments issued/paid and payments issued/not cashed:

1. Issued & Paid

<u>Payee</u>	<u>Amount</u>	<u>Payee</u>	<u>Amount</u>
Tittle & Perlmutter	\$ 65,587.09	Jasmine Merriweather	\$ 174.79
Rasheda Johanson	\$ 121.85	Lamont Durham	\$ 95.38
April Moore	\$ 148.32	Kendra Stabler	\$ 95.38
Jane Cassani	\$ 68.91	Angela Stover	\$ 95.38
Sharon Burns	\$ 2,239.40	Makeea S. Patterson	\$ 148.32
Andrea Reynolds	\$ 254.19	Christina Harris	\$ 254.19
Alexander Dolin	\$ 1,445.32	Dawn Wood	\$ 571.83
Anjelica Mooris	\$ 2,398.21	Darrea Ragland	\$ 492.42
Ann M. Petricca	\$ 413.01	Melanie Baron Vilk	\$ 5,189.95
Allen Steele	\$ 730.64	LaVoya Behanan	\$ 95.38
Alexandra Toth	\$ 1,365.91	Wilbert Webb	\$ 148.32
Vernon Davis	\$ 121.85	Daisetta Harris	\$ 174.79
A'Ishah Braxton	\$ 968.87	Jeleni Chavers	\$ 95.38
Courtney Edwards	\$ 3,668.74	Flauctisha Townsend	\$ 57.03
Jamal Stephenson	\$ 5,711.63	Helena Tiwaah	\$ 57.03
Natalia Varias	\$ 4,462.82	Alexis Parks	\$ 87.29
Stacy Slack	\$ 95.38	Caroline Keino	\$ 50.00
Kelsey Gill	\$ 148.32	Healthier Harris	\$ 50.00

**EXHIBIT 1-A**

<u>Payee</u>	<u>Amount</u>	<u>Payee</u>	<u>Amount</u>
Vemon Davis	\$ 117.55	Erica Boyd	\$ 813.57
Marissa B Carter	\$ 420.17	Mickie Chaney	\$ 92.99
Esaie Cene	\$ 722.78	Camielle Howard	\$ 92.99
Aaron Davis	\$ 359.65	Makeea S Patterson	\$ 147.82
Brittany Humphrey	\$ 329.39	Johnotre Busby	\$ 50.00
Bianca Lee	\$ 450.43	Melvin Brooks	\$ 1,358.27
Ruth Mitchell	\$ 541.21	Tenesha L miller	\$ 117.56
Sa'id Tarrence	\$ 420.17	Renee Washington	\$ 178.08
Keturah Thompson	\$ 329.39	Jasmine N Merriweather	\$ 178.08
DeNesha Bell	\$ 208.34	Lamont Durham	\$ 50.00
Emi Spiro	\$ 420.17	Mitchell Townsend	\$ 87.29
Douglas Taylor	\$ 420.17	Carissa Blatz	\$ 662.26
Dallas Rsessner	\$ 722.78	Kendra Stabler	\$ 87.29
Jennifer Frymier	\$ 632.00	Brenda Guzman	\$ 92.99
Darrea Ragland	\$ 541.21	Mary Beth Zins	\$ 178.08
Jane Cassano	\$ 57.03	Jasmine Ortiz	\$ 178.08
Courtney Edwards	\$ 4,172.58	Kelsey Gill	\$ 147.32
Ann M Petricca	\$ 450.43	Vvibert Webb	\$ 147.82
Allen Steele	\$ 813.56	Angela Stover	\$ 87.29
Alexander Dolin	\$ 1,630.62	Shane Satterfield	\$ 92.99
Alecandra Toth	\$ 1,539.84	Della Haley	\$ 268.86
A'Ishah C Braxton	\$ 1,085.92	Stacy Slack	\$ 87.29
Jamal Stephenson	\$ 695.67	Rasheda Johnson	\$ 117.56
Anjelica Morris	\$ 2,720.03	Maquisha Lee	\$ 147.82
Sharon Burns	\$ 2,538.47	Reagon Hammock	\$ 117.56
Andrea Reyonlds	\$ 268.86	Latwsna Wright	\$ 178.08
Samawada Dahir	\$ 92.99	Alicia Arends	\$ 359.65
Ashley Clay	\$ 178.08	Ladamoneek Broadus	\$ 87.29
Laura Chunn	\$ 50.00	Lauren Harville	\$ 50.00
David Brown	\$ 329.39	Tylere Legere	\$ 117.56
LaVoya Behanan	\$ 87.29	Madi Jackson	\$ 92.99
Andrea Williams-Parkd	\$ 50.00	Kimberly Brewster	\$ 632.00
Rachael DeGregario	\$ 178.08	Jorge Arroyo	\$ 1,025.40
Cherelle Scott	\$ 147.82	Adrienne Lee- Garland	\$ 50.00
Nina Weiss	\$ 50.00	Natalia Varias	\$ 5,080.42
Christina Harris	\$ 268.86		
Lisa Huff	\$ 50.00		
Michelle Cueves	\$ 92.99	<b>Total</b>	<b>\$137,322.49</b>



## 2. Issued &amp; Not Cashed

<u>Payee</u>	<u>Amount</u>	<u>Payee</u>	<u>Amount</u>
Mitchell Townsend	\$ 95.38	Robin Jackson	\$ 57.03
Flauclisha Townsend	\$ 68.91	Lesha Malave	\$ 87.29
Helena Tiwaah	\$ 68.91	Justin J mcdowell	\$ 57.03
Cassidy Nicholson	\$ 68.91	Chaunte U Mills	\$ 147.82
Antoinette Harrison	\$ 68.91	Ramon Moon	\$ 208.34
Ladamoneek Broadus	\$ 95.38	April Moore	\$ 147.82
Vvibert Webb	\$ 148.32	Jason Pemberton	\$ 208.34
Jason Troup	\$1,604.13	Emy-Lynn Smoot	\$ 92.99
Lena Todd	\$ 121.85	Sir A taylor	\$ 50.00
Jorge Arroyo	\$ 915.93	Quameem Vernon	\$ 50.00
Alexis Parks	\$ 95.38	Briana Walker	\$ 50.00
Tenesha L Miller	\$ 121.85	Caitlin Cleary	\$ 50.00
Lorna McLain	\$ 386.54	Gavin Eberhardt	\$ 50.00
Kudzai J Matemachani	\$ 148.32	Cassidy Nicholson	\$ 57.03
Lesha Malave	\$ 95.38	Latoya Walker	\$ 50.00
Robin Jackson	\$ 68.91	Noel Beyer	\$ 178.08
Monique Haeden	\$ 121.85	Maurice King	\$ 50.00
Reagon Hammock	\$ 121.85	Melanie Baron Vilc	\$ 173.99
Della Haley	\$ 254.19	Dawn Glaze	\$ 87.29
Aaliyah Ali	\$ 68.91	Antoinette Harrison	\$ 57.03
Allen Steele	\$ 730.64		
Delores Crosby	\$ 480.69	<b>Total</b>	<b>\$ 11,111.37</b>
Sheldon Williams	\$ 117.56		
Daisetta Harris	\$ 178.08		
Lena Todd	\$ 117.56		
Kenneth Holbert	\$ 268.86		
Kudzai J Matemachani	\$ 147.82		
Barbata Harvey	\$ 178.08		
Kyrsa Alexander	\$ 92.99		
Kimberly Benner	\$ 57.03		
Aaliyah Ali	\$ 57.03		
Rodolfo Arviza	\$ 50.00		
Damion Boyd	\$ 904.35		
Nakulan Balasubraman	\$ 92.99		
Hilda Boyer	\$ 238.60		
Jelani Chavers	\$ 87.29		
Dwight Colvin	\$ 92.99		
Traci Blaylock	\$ 147.82		
Ronald Curry	\$ 117.56		
Lashena M Hanna	\$ 92.99		
Monique Harden	\$ 117.56		
Lena Harris	\$ 92.99		

By my clients' analysis, a total of \$148,433.86 has been issued under the settlement agreement. I believe you were also going to put together an analysis so that we can compare each and come to some determination as to what else needs to be issued and how to do that under the current circumstances of the employer having filed for bankruptcy.

Perhaps you can try and contact those claimants who have been issued checks but have not cashed them to discover why they have not been cashed. If, for instance, they have changed addresses or have not received the checks for some reason, it would be helpful to know this as additional checks are issued. What is odd is that some of the same persons have received and cashed checks but also have been issued checks that have not been cashed (Flauctisha Townsend and Melanie Baron (Vilk), for instance).

Also, it appears that the named Plaintiffs in the most recent matter filed, Jamal Stephenson and Melanie Baron (Vilk), have each been fully compensated such that their claims are subject to accord and satisfaction and they have no standing to assert the claims made. This may give rise to more than just Fed. Civ.R. 12(b)(6) issues, but also Rule 11. I'd prefer not to have to go down that road, so maybe you should look into that and substitute plaintiffs, at a minimum. Obviously, we'd prefer that you simply dismiss the action so that my clients do not have to incur any further expense associated with defending those claims, which in our view are baseless.

Finally, as you pointed out in our call, as the checks were being issued by their "employer" Family Solutions of Ohio, Inc. and that employer has now filed for bankruptcy, we should figure out a way that payments can be made from a source other than the employer based on the claims that were asserted. This is not a situation, as may or may not agree, where Mr. Hopkins or Ms. Smith, for instance, can issue payroll checks from their personal accounts and my understanding is that your clients were never employed in a payroll sense by Prostar Management, Inc. So, if there must be a filing in the bankruptcy action to allow FSO to make payroll payments under the settlement agreement with the bankruptcy court's blessing, we should look into that.

Let's discuss this further once you have had a chance to look into these issues further.

Very truly yours,

*Colin P. Sammon*

Colin P. Sammon



Scott Perlmutter &lt;scott@tittlelawfirm.com&gt;

**Stephenson v. Family Solutions**

34 messages

Scott Perlmutter &lt;scott@tittlelawfirm.com&gt;

Sun, Jun 23, 2024 at 10:07 AM

To: Donald Slezak &lt;dslezak@grsm.com&gt;, David Campbell &lt;dcampbell@grsm.com&gt;

Cc: "Thomas A. Downie" &lt;tom@chagrinlaw.com&gt;, Mary Kraus &lt;mary@tittlelawfirm.com&gt;, Alana Polk &lt;alana@tittlelawfirm.com&gt;, Kelsey Will &lt;kelsey@tittlelawfirm.com&gt;

Bcc: AliciaArendsvFamilySolutionsofOhioIncZ2227835@projects.filevine.com

Don/David -

As you'll see in the attachment, your clients did not send checks on June 1 or June 3, but rather June 13. I also have doubts as to whether many of the checks were sent at all, as we've confirmed addresses many times with nearly all of the class members, and many have not received any check.

I'm going to schedule another Zoom for Wednesday morning at 9. Please let me know if that doesn't work.

So that we can have accountability and the ability to monitor Defendants' representations about issuance of checks, particularly given your clients' proven non-compliance with the settlement agreement, I'll propose the following process:

Before our call, I'll send you a list of those recipients who have (a) not received one or more of their settlement checks, and (b) would prefer a new check issued to my office for me to distribute from there. I will send you proof (emails from those class members) who want the checks sent this way. Since your client has not complied with the settlement agreement (i.e. checks were not issued on 6/1 or 6/3), we'll expect those checks to be re-issued and sent to my office by 7/1. For any other class member who hasn't indicated before Wednesday that they would like a check issued to my office, your client will comply with the settlement agreement in terms of issuing a report on 8/1 regarding the status of their checks.

Please let me know if you have any questions or concerns.

--

Very Truly Yours,

Scott D. Perlmutter

***Please Use Our New Mailing Address:***

4106 Bridge Avenue

Cleveland, Ohio 44113

Phone: 216-308-1522

Fax: 888-604-9299

E-mail: [scott@tittlelawfirm.com](mailto:scott@tittlelawfirm.com)*With Offices in Elyria, Chardon, and Sandusky*Website: [www.tittlelawfirm.com](http://www.tittlelawfirm.com)

WARNING TO CLIENTS: The attorney-client privilege which protects the confidentiality of this communication may be lost by forwarding it to others. Do not forward this message without first consulting the sender.

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and as such is privileged and confidential. If the reader of this message is not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and permanently delete the original message.

**EXHIBIT 1-B**





Scott Perlmutter &lt;scott@tittlelawfirm.com&gt;

---

**Stephenson v. Family Solutions**

5 messages

**Scott Perlmutter** <scott@tittlelawfirm.com>

Thu, Jun 27, 2024 at 10:52 AM

To: David Campbell &lt;dcampbell@grsm.com&gt;, Donald Slezak &lt;dslezak@grsm.com&gt;

Cc: "Thomas A. Downie" &lt;tom@chagrinlaw.com&gt;

Bcc: AliciaArendsvFamilySolutionsofOhioIncZ2227835@projects.filevine.com

David/Don -

We hereby make a final request for a personal conference **tomorrow** with Defendants' counsel as required by the Court's April 11, 2024 Order. The Order states that "[p]rior to the filing of any future Motion to Enforce in this action, Plaintiffs' Counsel and Defendants' Counsel are required to meet and confer, in good faith, to attempt to resolve the dispute." Order at 18. Counsel are to "meet and confer ... in person, by video conference, or by telephone conference." *Id.*

We request and demand a personal conference with you no later than end of day Friday, June 28, 2024 for the purpose of discussing the breach of the Settlement Agreement by Defendant Family Solutions ("FSO"). Our proposed terms to rectify that breach are stated below.

First, to recap the events of the last several weeks, the second Installment Date under the Agreement was June 1, 2024. Defendant FSO breached the Settlement Agreement by failing to pay the Second Installment as agreed.

Further, FSO repeatedly misstates the facts in an attempt to conceal its default. On June 10 and 12, 2024, Don Slezak emailed me regarding the Second Installment. After "talk[ing] with Dawn," Don stated that "[t]he second installment checks and the checks for those individuals who have not yet cashed the first installment checks have both been sent to the new addresses on the list you provided." "As to the date," Don stated that "the checks went out last Monday – the first business day following the June 1 Saturday."

That information proved to be untrue. A few class members eventually received checks and I asked them to provide me with images of the mailing envelopes. Those envelopes show a mailing date of June 13. You've tried to follow up with your clients to get more information as to when/how the checks were sent, but they will not even give you the name of the person who allegedly sent them. Of the roughly 50 class members who have contacted me about not receiving a check, every single one gave me an updated address two months ago. It is utterly implausible that these checks were actually issued. I also have not received the Second Installment payment of attorney's fees. That payment was due "on or before the applicable Installment Date," i.e., June 1, 2024.

I understand that your clients have claimed that they can't get more information about the issuance of the checks until Saturday. However, providing that information is immaterial, since your clients have already breached the Settlement Agreement and do not tell the truth about their actions.

To rectify these serious and repeated breaches of the Settlement Agreement by FSO, we propose the following.

- 1) I've given you a list of class members who "desire to have their checks issued to my office for me to distribute." FSO will send their checks to Tittle & Perlmutter by FedEx, for delivery no later than July 3, 2024. Alternatively, those checks may be reissued to each of the class members by FedEx, with the tracking numbers provided to me so that we can monitor the issuance; and
- 2) FSO will send the Second Installment payment of attorney's fees to Tittle & Perlmutter by FedEx, for delivery no later than July 3, 2024; and
- 3) FSO will issue the Third Installment payments by FedEx - either sending them all to me to distribute, or sending class payments directly to class members but providing me with tracking information.

Without agreement on these matters, we will have no choice but to move the Court to ask Defendants to appear personally and show cause as to why they should not be held in contempt.

Let us know what time works for you tomorrow. Again, there is no point in waiting for immaterial and likely false information from your clients. They've already breached the Settlement Agreement, and we're making this reasonable demand to rectify that breach.

--

Very Truly Yours,  
Scott D. Perlmuter



***Please Use Our New Mailing Address:***

4106 Bridge Avenue

Cleveland, Ohio 44113

Phone: [216-308-1522](tel:216-308-1522)

Fax: [888-604-9299](tel:888-604-9299)

E-mail: [scott@tittlelawfirm.com](mailto:scott@tittlelawfirm.com)

*With Offices in Elyria, Chardon, and Sandusky*

Website: [www.tittlelawfirm.com](http://www.tittlelawfirm.com)

WARNING TO CLIENTS: The attorney-client privilege which protects the confidentiality of this communication may be lost by forwarding it to others. Do not forward this message without first consulting the sender.

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and as such is privileged and confidential. If the reader of this message is not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and permanently delete the original message.

---

**David Campbell** <[dcampbell@grsm.com](mailto:dcampbell@grsm.com)>

Thu, Jun 27, 2024 at 12:20 PM

To: Scott Perlmuter <[scott@tittlelawfirm.com](mailto:scott@tittlelawfirm.com)>, Donald Slezak <[dslezak@grsm.com](mailto:dslezak@grsm.com)>

Cc: "Thomas A. Downie" <[tom@chagrinlaw.com](mailto:tom@chagrinlaw.com)>

Scott, I have an all-day hearing tomorrow in federal court. I am preparing for it today – two separate issues and about six witnesses. The person who is putting together the spreadsheet is John Hopkins, Jr. As I told you, we will have the summary Saturday.

---

**DAVID A. CAMPBELL** | Partner

**GORDON REES SCULLY MANSUKHANI / GRSM50**  
**YOUR 50 STATE LAW FIRM™**

[600 Superior Ave., East, Fifth Third Building, Suite 1300, Cleveland, OH 44114](#)

[41 South High Street, Suite 2495, Columbus, Ohio 43215](#)

C: [216-385-5347](tel:216-385-5347) | [dcampbell@grsm.com](mailto:dcampbell@grsm.com)

[www.grsm.com](http://www.grsm.com)  
vCard | Bio

[Quoted text hidden]



Scott Perlmutter <scott@tittlelawfirm.com>

---

## Hopkins

Scott Perlmutter <scott@tittlelawfirm.com>

Mon, Nov 18, 2024 at 9:16 PM

To: colin@sammonlaw.com

Cc: "Thomas A. Downie" <tom@chagrinslaw.com>

Bcc: AliciaArendsvFamilySolutionsofOhioIncZ2227835@projects.filevine.com

See attached and let me know what you think. This basically has them issuing checks to bring those class members up to date for whom they either (a) have issued less than the 2 checks due to date, or (b) I got an updated address. With this plan, they would void/stop payment on all checks they sent out that haven't yet been cashed.

[Quoted text hidden]

---

### 2 attachments

 **Exhibit A.xlsx**  
27K

 **StephensonJamal.MotionToModifySettlementTerms.docx**  
37K



Scott Perlmutter <scott@tittlelawfirm.com>

---

## Stephenson

---

Donald Slezak <dslezak@grsm.com>

Wed, Jun 12, 2024 at 8:24 AM

To: Scott Perlmutter <scott@tittlelawfirm.com>

Cc: David Campbell <dcampbell@grsm.com>, "Thomas A. Downie" <tom@chagrinlaw.com>

The second installment checks and the checks for those individuals who have not yet cashed the first installment checks have both been sent to the new addresses on the list you provided.

**From:** Scott Perlmutter <scott@tittlelawfirm.com>

**Sent:** Tuesday, June 11, 2024 10:58 AM

**To:** Donald Slezak <dslezak@grsm.com>

**Cc:** David Campbell <dcampbell@grsm.com>; Thomas A. Downie <tom@chagrinlaw.com>

**Subject:** Re: Stephenson

---

[Quoted text hidden]

EXHIBIT 1-C



Scott Perlmutter &lt;scott@tittlelawfirm.com&gt;

---

## June Payment Update

10 messages

---

**David Campbell** <dcampbell@grsm.com>

Sun, Jun 30, 2024 at 7:18 AM

To: Scott Perlmutter &lt;scott@tittlelawfirm.com&gt;, "Thomas A. Downie" &lt;tom@chagrinlaw.com&gt;

Cc: David Campbell &lt;dcampbell@grsm.com&gt;, Donald Slezak &lt;dslezak@grsm.com&gt;

Scott, thank you for giving me the time to investigate this matter. Attached is the updated spreadsheet. Unfortunately, not all of the checks have been issued. In addition, as you recognized, not all of the checks were sent in early June as was reported. I am sorry for the miscommunication and I have been working this week to learn the facts.

John Hopkins Sr. was traveling early in June. Due to his absence, I did not get the true facts until his return. The problem arose from a cyberattack on Change Healthcare. Change Healthcare is a clearing house for billions of medical claims each year. The cyberattack left healthcare providers with cash flow problems beginning in March. An article detailing the cyberattack and resulting cash flow problems is below.

These cash flow problems also hit Family Solutions and Family Solutions simply did not have the excess cash to pay both current payroll and the June payments. Had John Hopkins Sr. been available, we would have told you about the cyber-attack and asked for an extension. Mr. Hopkins Sr. has confirmed that the final checks are being mailed over the coming days. The cash flow issues should be fully-remedied by the middle of July and the final checks will be issued by the end of July.

Please let me know when you have time to touch base.

Thanks.

[What We Learned: Change Healthcare Cyber Attack \(house.gov\)](#)

---

**DAVID A. CAMPBELL** | Partner

**GORDON REES SCULLY MANSUKHANI / GRSM50**  
**YOUR 50 STATE LAW FIRM™**

600 Superior Ave., East, Fifth Third Building, Suite 1300, Cleveland, OH 44114

41 South High Street, Suite 2495, Columbus, Ohio 43215

C: 216-385-5347 | [dcampbell@grsm.com](mailto:dcampbell@grsm.com)





Scott Perlmutter <scott@tittlelawfirm.com>

July 20, 2024 Update(91020714.1)

Scott Perlmutter <scott@tittlelawfirm.com> Mon, Jul 22, 2024 at 7:47 PM  
To: David Campbell <dcampbell@grsm.com>  
Cc: Alana Polk <alana@tittlelawfirm.com>, David Campbell <dcampbell@grsm.com>, Donald Slezak <dslezak@grsm.com>, Kelsey Will <kelsey@tittlelawfirm.com>, "Thomas A. Downie" <tom@chagrinlaw.com>

We didn't get the promised schedule. Were checks sent out Friday?

Very Truly Yours,  
Scott D. Perlmutter



Please Use Our New Mailing Address:

4106 Bridge Avenue  
Cleveland, Ohio 44113  
Phone: 216-308-1522  
Fax: 888-604-9299  
E-mail: scott@tittlelawfirm.com

With Offices in Elyria, Chardon, and Sandusky  
Website: www.tittlelawfirm.com

WARNING TO CLIENTS: The attorney-client privilege which protects the confidentiality of this communication may be lost by forwarding it to others. Do not forward this message without first consulting the sender.

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and as such is privileged and confidential. If the reader of this message is not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and permanently delete the original message.

On Sat, Jul 20, 2024 at 7:21 AM David Campbell <dcampbell@grsm.com> wrote:

The client is going to finalize the proposed pay dates for the remaining class members by Monday. I had some proposed changes that the client is reviewing. The updated check status is attached. The most recent mailings are below.

1286	6/26/2024	Carolyn Cates	2448 22nd St	Sarasota FL	34234-7700	\$ 268.86 Mailed
1275	6/26/2024	Toyia McCollum	14092 Lorain Avenue Apt.214	Cleveland OH	44111	\$ 117.56 Mailed
1264	6/26/2024	Renee Washington	7260 Springoak Court	Pickerington OH	43147	\$ 178.08 Mailed

EXHIBIT 1-D



Scott Perlmutter &lt;scott@tittlelawfirm.com&gt;

**July 20, 2024 Update(91020714.1)**

6 messages

**David Campbell** <dcampbell@grsm.com>

Sat, Jul 20, 2024 at 7:21 AM

To: "Thomas A. Downie" &lt;tom@chagrinlaw.com&gt;, Scott Perlmutter &lt;scott@tittlelawfirm.com&gt;

Cc: David Campbell &lt;dcampbell@grsm.com&gt;, Donald Slezak &lt;dslezak@grsm.com&gt;

The client is going to finalize the proposed pay dates for the remaining class members by Monday. I had some proposed changes that the client is reviewing. The updated check status is attached. The most recent mailings are below.

1286	6/26/2024	Carolyn Cates	2448 22nd St	Sarasota FL	34234-7700	\$ 268.86	Mailed
1275	6/26/2024	Toyia McCollum	14092 Lorain Avenue	Apt.214 Cleveland OH	44111	\$ 117.56	Mailed
1264	6/26/2024	Renee Washington	7260 Springoak Court	Pickerington OH	43147	\$ 178.08	Mailed
1248	6/26/2024	Rasheda Johnson	6471 Chelsea Glen Drive	Canal Winchester OH	43110	\$ 117.56	Mailed
1243	6/26/2024	Kelsey Gill	71155 Olivesburg Fitchville Rd	Greenwich OH	44837	\$ 147.32	Mailed
1241	6/26/2024	Vernon Davis	2686 Erlene Dr Apt 2205	Cincinnati OH	45238-2873	\$ 117.55	Mailed
1232	6/26/2024	Mary Beth Zins	724 Streamside Drive	Alexandria KY	41001	\$ 178.08	Mailed
1228	6/26/2024	Sheldon Williams	3565 Stoer Rd #8	Shaker Hts OH	44122	\$ 117.56	Mailed
1226	6/26/2024	Vvibert Webb	1294 Oakland Park Ave	Columbus OH	43224-3324	\$ 147.82	Mailed
1214	6/26/2024	LENA TODD	1801 Rosson Rd	Little Elm TX	75068-8534	\$ 117.56	Mailed
1167	6/26/2024	KUDZAI J MATEMACHANI	1500 DETROIT AVE APT 614	CLEVELAND OH	33113	\$ 147.82	Mailed